

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

LA VON SCHMOLL, Individually and as Special Administrator for the Estate of CYRIL C. SCHMOLL, Deceased, Plaintiff, v. OWENS-ILLINOIS, INC., Defendant.))))))) Case No. 3:98-cv-00693-wmc))(E.D. Pa. Case No. 09-CV-61026-ER)
GARY SUOJA, Individually and as Special Administrator for the Estate of OSWALD F. SUOJA, Deceased, Plaintiff, v. OWENS-ILLINOIS, INC., Defendant.))))))) Case No. 3:99-cv-00475-bbc))(E.D. Pa. Case No. 09-CV-60256-ER)
BARBARA CONNELL, Individually and as Special Administrator for the Estate of DANIEL CONNELL, Deceased, Plaintiff, v. OWENS-ILLINOIS, INC., Defendant.))))))) Case No. 3:05-cv-00219-bbc))(E.D. Pa. Case No. 09-CV-60552

PARTIES' JOINT PROPOSED SCHEDULING ORDER

Plaintiffs and Owens-Illinois, Inc. ("Owens-Illinois") submit this joint proposed plan on post-remand coordinated pretrial proceedings pursuant to the telephonic status conferences and Order of April 30, 2014.

1. Supplementation of Rule 26(a)(2)(B) expert reports, if any, due September 19, 2014.

2. Depositions of 26(a)(2)(B) expert witnesses to be completed by December 19, 2014. These depositions are limited in scope to the supplemental matter in the expert reports.

3. Daubert motions are due January 8, 2015. Plaintiff's position is that all Daubert motions must be non-dispositive.

4. Responses to Daubert motions are due February 20, 2015.

5. Replies in support of Daubert motions, if any, are due March 6, 2015.

Dated: May 9, 2014 <u>/s/ Robert G. McCoy</u> Michael P. Cascino Robert G. McCoy Jin-Ho Chung Cascino Vaughan Law Offices, Ltd. 220 S. Ashland Avenue Chicago, Illinois 60607 Phone: (312) 944-0600 Fax: (312) 944-1870 <i>Attorneys for Plaintiffs</i>	Respectfully submitted, <u>/s/Brian O. Watson</u> Matthew J. Fischer Edward Casmere Brian O. Watson Schiff Hardin LLP 233 S. Wacker Drive Suite 6600 Chicago, Illinois 60606 Phone: (312) 258-5500 Fax: (312) 258-5600 <i>Attorneys for Defendant Owens-Illinois, Inc.</i>
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CERTIFICATE OF SERVICE

The undersigned attorney certifies that on May 9, 2014, these papers were filed with the Clerk of the Court for the United States District Court for the Western District of Wisconsin using the CM/ECF system, which will send notification of such filing upon all parties who have appeared.

/s/ Jin-Ho Chung